

**AFFIDAVIT OF CADERON TYRRELL****STATE OF NEW YORK****COUNTY OF FULTON**

I, **Caderon Tyrrell**, being duly sworn, depose and say under penalty of perjury that the following is true to the best of my knowledge:

1. I am over the age of eighteen and reside in Johnstown, New York. I have personal knowledge of the facts stated in this affidavit and am competent to testify to them.
2. I have known **Kayla Leigh Orsell** for several years and am familiar with her medical, legal, and personal circumstances. I have witnessed the difficulties she has experienced due to her disabilities and the repeated denial of accommodations by public officials.
3. I was present when Kayla received certain certified mailings from the U.S. District Court, including ones that were already opened when she found them. These mailings were signed for by other individuals without her knowledge or consent. She had no idea the documents had arrived until I showed them to her, or she discovered them unexpectedly.
4. I have personal knowledge that her stepmother and father open court mail and other sensitive legal materials addressed to Kayla. Her father admitted in front of me that a postal worker signed for at least one certified letter in her stepmother's name.
5. I also witnessed Kayla's struggles with preparing and mailing her legal filings. Her phone, computer, and internet connection were frequently unstable, with missing files, unexplained reboots, and programs closing by themselves. These issues seemed to get worse whenever she was trying to finish court documents or send them out.

6. On or around **October 15, 2024**, I was driving Kayla's 2010 Volkswagen Jetta when the vehicle suddenly malfunctioned and crashed into a parked car. I had not used any drugs or alcohol, and I passed 2 out of 3 field sobriety tests despite having a broken nose and being in visible pain. I was arrested for DWAI without proper cause and was bleeding for an extended period before being taken for medical attention. I was forced to take a plea and lose my driving privileges for 90 days.
7. Kayla's father and grandfather arrived at the crash scene within minutes—**without being called by me or anyone else**. I felt intimidated by their presence, which discouraged me from going to the hospital. I later found out that Kayla's father claimed to have removed collision coverage just weeks before the crash—an unusual and suspicious decision.
8. I also believe Kayla's family has played a role in obstructing her access to her legal documents, transportation, and communications.
9. I have witnessed her probation officer, Shari Acquilla-Simon, treat her harshly and dismissively, refusing to honor her disability-based limitations. This treatment has worsened Kayla's mental and physical health and made it difficult for her to comply with her supervision without severe hardship.
10. I affirm that Kayla's legal filings are truthful and accurate to the best of my knowledge. I support her ADA complaint, her Rule 60(b) motion to reopen her habeas case, and her CPL § 440.10 motion in state court.
11. I respectfully urge the Court to consider the emotional, physical, and systemic harm she has endured, and to grant the relief she seeks in each of her proceedings.

**FURTHER AFFIANT SAYETH NAUGHT.**

Caderon Tyrrell

**Caderon Tyrrell**

Sworn to before me this 20<sup>th</sup> day of May, 2025.

Mary Ann Mars

**Notary Public**

My Commission Expires: 9/22/2028

**Mary Ann Mars**  
**Notary Public, State of New York**  
**No. 01MA6193730**  
**Qualified in Fulton County**  
**My Commission Expires on 9/22/2028**